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August 25, 2008

Honorable Joseph J. Farnan, Jr.
United States District Court for
the District of Delaware
J. Caleb Boggs Federal Building
844 N. King Street
Room 4124
Lockbox 27
Wilmington, DE 19801

RE: *Maria Maniatakis v. Ohio Casualty Group & West American Insurance Company,*
U.S.D.C. D. DE, C.A. No. 08-64-JJF
Our File No. 1562-00108

Dear Judge Farnan:

We represent the Defendants, Ohio Casualty Group and West American Insurance Company, in the above-entitled action. Pursuant to Your Honor's Rule 16 Scheduling Order of April 9, 2008, discovery in this matter is set to be completed by August 29, 2008. Furthermore, this case is presently scheduled for Mediation before Judge Thyng on September 19, 2008.

We have attempted to complete discovery within the period set by the Court, but we have been unable to do so. We attempted to take the deposition of the purchaser of the business located at the insured premises, but we learned that the address provided for him in the claim file was incorrect. We were, therefore, required to engage an investigator to locate this individual. He has recently been located and his deposition and the deposition of one of his employees are currently scheduled for September 17 and 18, 2008. These depositions are subject to the Court's agreement to extend discovery in this matter.

These depositions will be very significant to our clients' evaluation of this case and Defendants' ability to participate in the Mediation of this matter. We, therefore, respectfully request that the discovery deadline be extended through September 30, 2008, to allow these depositions to take place. We are furthermore going to request that the Mediation be rescheduled to the next date that is convenient for Judge Thyng, following the conclusion of discovery.

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We have discussed these requests with Robert Goldberg, Esquire, the attorney for the Plaintiff in this matter, and he is agreement with them.

We appreciate the Court' s consideration of this matter.

Respectfully submitted,

/s/ Vicki L. Goodman
VICKI L. GOODMAN
WILLIAM C. FOSTER

WCF:ag

Cc: Robert Goldberg, Esquire

15/663442.v1

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August 25, 2008

Honorable Mary Pat Thyng
United States District Court for
the District of Delaware
J. Caleb Boggs Federal Building
844 N. King Street
Room 2124
Lockbox 8
Wilmington, DE 19801

RE: *Maria Maniatakis v. Ohio Casualty Group & West American Insurance Company,*
U.S.D.C. D. DE, C.A. No. 08-64-JJF
Our File No. 1562-00108

Dear Judge Thyng:

We represent the Defendants, Ohio Casualty Group and West American Insurance Company, in the above-entitled action. Pursuant to Judge Farnan's Rule 16 Scheduling Order of April 9, 2008, discovery in this matter is set to be completed by August 29, 2008. Furthermore, this case is presently scheduled for Mediation before Your Honor on Friday, September 19, 2008.

After having discussed this case with Plaintiff's counsel and with his agreement, we hereby respectfully request that the Mediation be continued in this matter. Counsel have diligently tried to schedule the depositions of the parties, however, due to circumstances beyond our control, we have been unable to do so within the period set by the Court. We furthermore attempted to take the deposition of the purchaser of the business located at the insured premises, but we learned that the address provided for him in the claim file was incorrect. We were, therefore, required to engage an investigator to locate this individual. He has recently been located and his deposition and the deposition of one of his employees are currently scheduled for September 17 and 18, 2008. These depositions are subject to the Court's agreement to extend discovery in this matter.

We have requested that Judge Farnan extend the discovery period in this matter through September 30, 2008 and we are enclosing herewith a copy of our letter to Judge Farnan making this request. We, therefore, respectfully request that the Mediation be rescheduled to the next date that is convenient for Your Honor, following the conclusion of discovery.

August 25, 2008

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As mentioned above, we have discussed these requests with counsel for Plaintiff and he is agreement with them.

We appreciate Your Honor's consideration of this matter.

Respectfully submitted,

/s/ Vicki L. Goodman
VICKI L. GOODMAN
WILLIAM C. FOSTER

WCF:ag

Enclosure

Cc: Robert Goldberg, Esquire

15/663448.v1

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

MARIA MANIATAKIS,

Plaintiff,

v.

**OHIO CASUALTY GROUP and
WEST AMERICAN INSURANCE
COMPANY,**

Defendants.

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CIVIL ACTION

NO. 08-064 (JJF)

STIPULATION TO EXTEND THE DISCOVERY DEADLINE

WHEREAS, the parties have respectfully requested that the Court consider an extension of the Discovery Deadline from august 29, 2008 to September 30, 2008;

WHEREAS, the basis for the request for an extension of time is the parties require additional time to complete various depositions and were unable to do so within the prescribed timeline due to circumstances out of their control;

WHEREAS, counsel for both parties have discussed such extension of time and have agreed to the same.

IT IS HEREBY STIPULATED by and between the parties, subject to the approval of the Court, that the Discovery Deadline is extended until September 30, 2008.

BIGGS & BATTAGLIA

MARSHALL, DENNEHEY, WARNER,
COLEMAN & GOGGIN

BY: /s/ Robert D. Goldberg
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American Insurance Company

WILLIAM C. FOSTER, ESQUIRE
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(215) 575-4551
Attorney for Defendants

Dated: 08/25/08

Dated: 08/25/08